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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;  
 ORACLE AMERICA, INC., a Delaware  
 corporation; and ORACLE INTERNATIONAL  
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
 SETH RAVIN, an individual,

Defendants.

Case No 2:10-cv-0106-LRH-PAL

**ORACLE'S MOTION TO SEAL  
 JOINT REQUEST FOR THE COURT  
 TO RULE ON OBJECTIONS TO  
 CUSTOMER DEPOSITION  
 TESTIMONY & HIXSON  
 DECLARATION EXHIBITS 1, 2, 4, 5,  
 6, 7, 8, 9**

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), Local Rules 10-5(b) and 16.1-4, and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation (collectively “Oracle”) respectfully request that the Court grant leave to file under seal certain portions of the parties’ Joint Request for the Court to Rule on Objections to Customer Deposition Testimony (“Joint Request”) and Exhibits 1-2 and 4-9 to the Declaration of Thomas Hixson in support of the same (the “Hixson Declaration”). Portions of the Joint Request and the identified supporting documents reflect information that Rimini Street, Inc. (“Rimini”) has designated “Highly Confidential - Attorneys’ Eyes Only” under the Protective Order. Public, redacted versions of these materials were filed on September 11, 2015, *see* Dkt. 760 and 761, and an unredacted version of each was subsequently filed under seal with the Court, *see* Dkt. 762-763.

The Protective Order states, “Counsel for any Designating Party may designate any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ under the terms of this Protective Order *only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c)*. The designation by any Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation.” Protective Order ¶ 2 (emphasis supplied).

Rimini has designated the following documents cited or referred to in the Joint Request as Confidential Information (“C”) or Highly Confidential - Attorneys’ Eyes Only (“HC”):

| Hixson<br>Decl. Ex. | Description                 | Designation |
|---------------------|-----------------------------|-------------|
| 1                   | Shepard Deposition          | C & HC      |
| 2                   | Ward Deposition             | HC          |
| 4                   | Maddock 30(b)(6) Deposition | C           |
| 5                   | PTX 405                     | HC          |
| 6                   | PTX 463                     | C           |

|   |                             |    |
|---|-----------------------------|----|
| 7 | Davis Expert Report         | C  |
| 8 | Davis Expert Report Exhibit | C  |
| 9 | PTX 2547                    | HC |

Oracle submits these documents as well as certain portions of the Joint Request under seal pursuant to the Protective Order based on Rimini's representation that it reasonably believes there is a valid basis under the Protective Order for its confidentiality designations. Because these materials were designated by Rimini, Oracle is not in a position to provide further justification for why filing them publicly would cause Rimini harm sufficient to show good cause.

Oracle has submitted all other portions of the Joint Request and supporting papers to the Court's public files, which allow public access to all materials except for the items discussed above. Accordingly, the request to seal is narrowly tailored. For the foregoing reasons, Oracle respectfully requests that the Court grant leave to file under seal the documents discussed above.

DATED: September 11, 2015

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Thomas S. Hixson  
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